

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITED STATES OF AMERICA)
)
)
 v.) **No:**
)
)
 APPROXIMATELY 1.573 BITCOIN)
 OR \$142,596.40 IN UNITED STATES)
 CURRENCY SEIZED FROM)
 BINANCE WALLET UID *2289)
)

VERIFIED COMPLAINT FOR FORFEITURE IN REM

Comes now the United States of America, by and through its counsel, Prim F. Escalona, United States Attorney for the Northern District of Alabama, and Kristen S. Osborne, Assistant United States Attorney, and respectfully shows the Court the following in support of its Complaint for Forfeiture:

1. This is a civil action *in rem* for the forfeiture of 1.573 Bitcoin, valued at \$142,596.40 in United States Currency, (hereinafter known as “Defendant Funds”) seized from a cryptocurrency wallet belonging to User ID (UID) *2289, hosted and maintained by Nest Services Limited, doing business as Binance, per 18 USC § 981(a)(1)(C).

2. The Court has jurisdiction over this subject matter per 28 U.S.C. §§ 1345 and 1355.

3. This Court has *in rem* jurisdiction over the Defendant Items per 28 U.S.C. § 1355.

4. This Court has venue over this action per 28 U.S.C. §§ 1355 and 1395.

Background Regarding Digital Currency

5. Virtual currencies are digital tokens of value circulated over the Internet as substitutes for traditional fiat currency. Virtual currencies are not issued by any government or bank like traditional fiat currencies such as the U.S. dollar, but rather are generated and controlled through computer software. Bitcoin (or BTC) is currently one of the most popular virtual currencies in use.

6. Virtual currency addresses are the digital locations to which such currencies are sent and received. A virtual currency address is analogous to a bank account number and is represented as a string of letters and numbers.

7. Virtual currency exchanges, like Binance, are trading and/or storage platforms for virtual currencies, such as BTC. Many exchanges also store their customers' virtual currency in virtual currency accounts. These virtual currency accounts are commonly referred to as wallets and can hold multiple virtual currency addresses.

8. Many virtual currencies, including BTC, publicly record all their transactions on what is known as a blockchain. The blockchain is a distributed public

ledger containing an immutable and historical record of every transaction utilizing that blockchain's technology. The blockchain can be updated multiple times per hour and records every virtual currency address that has ever received that virtual currency and maintains records of every transaction and all the known balances for each virtual currency address. There are different blockchains for different types of virtual currencies.

9. Blockchain explorers are online tools that operate as a blockchain search engine allowing users the ability to search for and review transactional data for any addresses on a particular blockchain. The blockchain explorer uses a database to arrange and present the data to a user in a searchable format.

10. While the identity of a virtual currency address owner is generally anonymous, law enforcement can identify the owner of a particular virtual currency address by analyzing the blockchain (e.g., the BTC blockchain). Over the course of this investigation, law enforcement, including the FBI, conducted blockchain analysis. In addition to using publicly-available blockchain explorers, law enforcement uses commercial services offered by several different blockchain analysis companies to investigate virtual currency transactions. These companies analyze virtual currency blockchains and attempt to identify relationships between transactions, wallets, and accounts in a manner that allows for them to be linked to

groups or individuals (although the exact identity of the underlying individuals is not available on the blockchain). Through numerous unrelated investigations, law enforcement has found the information provided by these companies to be reliable.

Factual Background

11. As of November 2024, SW, a resident of the Northern District of Alabama, owned several items of memorabilia and collectible coins (non-monetary) related to and featuring President Donald Trump. SW was a member of various online groups related to President Trump on the communication app Telegram.¹

12. During SW's activity in these Telegram groups, she saw related groups referencing "Trump Rebate Banking" (TRB) certificates. According to these groups, money would be paid out for ownership of Trump memorabilia previously purchased.

13. Following the Presidential election on November 5, 2024, SW engaged with one of the Telegram TRB groups that she had found, specifically making contact with Telegram user @savepatriot_hq. This Telegram user purported to be "TRB Payoff Project HQ" and promised SW a large amount of money for providing proof of her prior purchases of President Trump memorabilia.

¹ Telegram is a cloud-based application available for smartphones, tablets, or computer use that lets users send messages, photo, videos, and files. It allows users to create and join large public groups as well as share updates in public channels. Telegram is headquartered in the British Virgin Islands and hosts its operational center in the United Arab Emirates.

14. SW provided her personal information and pictures of her collection to @savepatriot_hq. In return, @savepatriot_hq promised SW would receive \$13,000,000.00 for “rebate” investment on her memorabilia purchases.

15. User @savepatriot_hq gave SW instructions on how to receive this “rebate,” specifically telling her to send two BTC transactions to a specific Binance-hosted wallet. These transactions were supposedly meant to pay for transaction fees and a code that would release the \$13,000,000.00 to SW. On November 11, 2024, SW sent \$69,867.18 and \$82,145.80, totaling \$152,012.98, from her Coinbase account to the wallet address provided by @savepatriot_hq.

16. After sending the BTC transactions and not receiving the promised code or payment in return, SW contacted the Lincoln Police Department. The Lincoln Police Department, using public blockchain tracing information, identified the wallet hosted by the cryptocurrency exchange platform Binance and then contacted the local FBI field office for further action.

17. Special Agent Christina Wessel of the Birmingham field office contacted Binance on November 15, 2024, to confirm the transactions and receive additional information regarding the wallet. Binance provided that the wallet was associated with email address p9445ybkxk@p*-*d.com and an account holder with the name of DUZA YUNUSA. The user listed their nationality to be Nigerian.

18. On November 18, 2024, Binance confirmed that \$142,596.40, or approximately 1.573 BTC remained in the account. Binance agreed to freeze these funds. Subsequently, a federal seizure warrant for the funds was obtained and executed. The funds are currently held in federal custody.

Applicable Law

19. Defendant Items are subject to forfeiture per 18 U.S.C. § 981(a)(1)(C) because they are property that constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343 (wire fraud). Further, pursuant to 18 U.S.C. § 984, currency or funds in a financial account are considered fungible for one year from the date of the applicable offense, and the assets located in the financial account described above and the following paragraphs are thus subject to civil forfeiture under § 984.

20. 18 U.S.C. § 1343 provides in pertinent part:

“Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.”

21. Based on the foregoing, the Defendant Funds were obtained through

fraudulent pretenses that were communicated through interstate and foreign commerce with the use of the Telegram app, resulting in the Defendant Funds being transferred from the victim SW to the Binance wallet of DUZA YUNUSA.

17. Notice will be published according to statutory requirements and sent to all possible claimants, including:

- a. **DUZA YUNUSA**, via email p9445ybkxk@p*-*d.com, and
- b. **Victim SW**, via mailing address.

WHEREFORE, the Plaintiff requests that due notice issue to enforce the forfeiture and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed; that the named Defendant Funds be condemned and forfeited to the United States of America for disposition according to law; and for such other and further relief as this Court may deem just and proper.

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VERIFICATION

I, Christina Wessel, am a Special Agent of the Federal Bureau of Investigation (FBI) and the agent assigned responsibility for this case. I have read the contents of the foregoing Complaint for Forfeiture *In Rem*. The statements contained therein are true to the best of my knowledge and belief. I base my knowledge for this verification of the Complaint for Forfeiture *In Rem* on the following:

- a. Information provided to me by other law enforcement officers who have participated in the investigation described in this Complaint;
- b. My own participation in the investigation prior to and following the seizure of the Defendant Funds; and
- c. My experience in investigations involving cybercrime and internet fraud, and the experience of other law enforcement officers related to such investigations.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed February 24, _____ 2025.

Christina Wessel
Special Agent
Federal Bureau of Investigation